

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
FEDERAL LAW ENFORCEMENT	)	
WIRELESS USERS GROUP	)	
	)	RM-10432
Petition for Rulemaking to Amend	)	
the Commission's Rules to Promote Interoperability	)	
and Efficient Use of Allotted Spectrum for Public	)	
Safety Agencies and Other Measures to Address	)	
Communications needs through the Year 2010	)	

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby submits the following comments in response to the above-captioned Petition for Rulemaking submitted by the Federal Law Enforcement Wireless Users Group ("FLEWUG"). *Public Notice*, Report No. 2549 (April 30, 2002).

APCO, founded in 1935, is the nation's oldest and largest public safety communications organization. Most of APCO's over 15,000 members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, emergency management, and other public safety agencies. APCO is a certified frequency coordinator for Part 90 Public Safety Pool channels.

FLEWUG has raised a number of important issues that should be addressed in a Commission rulemaking proceeding. These issues include facilitating rapid non-federal public safety agency access to federal spectrum, promoting incident command procedures, adopting a digital public safety interoperability equipment standard, and establishing receiver performance requirements.

APCO agrees with FLEWUG that the Commission and NTIA should establish clear, stream-lined procedures to permit state and local government public safety agencies to use federal radio spectrum in responding to specific emergency situations. As FLEWUG suggests, this could improve interoperability and provide additional spectrum resources for non-federal public safety agencies when circumstances warrant.

FLEWUG also asks that the Commission recommend implementation of an Incident Command System (ICS) for managing public safety communications resources during major emergencies. While we would welcome Commission consideration of this proposal, we realize that it may go beyond the Commission's normal area of expertise and jurisdiction.

The issue of digital interoperability standards has long been one of APCO's top priorities. APCO and others in the public safety community long ago recognized that the movement to digital equipment would require certain basic equipment standards to ensure interoperability. That concern led to the creation of Project 25, and the subsequent adoption by the Telecommunications Industry Association of the Project 25 digital interoperability standards. Today there are multiple vendors of Project 25 compliant equipment for each of the major public safety frequency bands. The Commission has also adopted the Project 25 standard for the 700 MHz interoperability channels. However, with that exception, Project 25 has been a voluntary standard that state and local agencies may use, but are not required to use, in their equipment procurements.

APCO agrees with FLEWUG that the time has come to consider FCC adoption of Project 25 as a requirement for digital communications on designated interoperability channels in all public safety frequency bands. The standard has gained wide acceptance, and the need for interoperability is now greater than ever. Without a common standard, there will remain the risk

that future digital radio systems in the same geographic area and operating on the same frequency band will lack interoperability due to the absence of a standard over-the-air interface and standard vocoder. The Project 25 standards provide widely accepted solutions to that problem.

Finally, as FLEWUG notes in its Petition, APCO has also long advocated adoption of receiver performance standards for public safety equipment. We reiterate that position and support further rulemaking on the issue.